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November 30, 2020

**VIA ECF**

Hon. Paul A. Engelmayer  
United States District Court Judge  
United States Courthouse  
40 Foley Square, Courtroom 1305  
New York, New York 10007

**Re: *United States v. David Binet*, 19 Cr. 824 (PAE)**

Dear Judge Engelmayer:

We represent Defendant David Binet in the above-captioned matter. In accordance with this Court's Individual Rule of Practice in Criminal Cases 7.E.ii and Fed. R. Crim. P. 49.1(e)(1), we make this application to redact information from Mr. Binet's sentencing memorandum and exhibits addressing sensitive information related to Mr. Binet's physical and mental health. *See Under Seal v. Under Seal*, 273 F. Supp. 3d 460, 467 (S.D.N.Y. 2017) ("A party may overcome the presumption of access by demonstrating that sealing will further other substantial interests such as a third party's personal privacy interests, the public safety, or preservation of attorney-client privilege.") (citing *United States v. Aref*, 533 F.3d 72, 83 (2d Cir. 2008)). Unless the Court orders otherwise, we also are filing redacted versions by ECF of certain portions of Mr. Binet's sentencing submissions that include: (1) identification of minors; and (2) home addresses of individuals. We make these redactions pursuant to Fed. R. Crim. P. 49.1(a) and the Local ECF Rules for the Southern District of New York.

We are simultaneously submitting to the Court unredacted electronic courtesy copies of all the materials electronically filed with the Court. We are also providing unredacted copies of all of Mr. Binet's sentencing submissions to the government.

We very much appreciate the Court's consideration of this request.

Respectfully Submitted,


**GRANTED.** The Clerk of Court is requested to terminate the motion at Dkt. No. 54.

12/1/2020

/s/ Ilana Haramati  
Henry E. Mazurek  
Ilana Haramati

*Counsel for Defendant David Binet*

SO ORDERED.

  
PAUL A. ENGELMAYER  
United States District Judge